

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION

IN RE: C.R. BARD, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION MDL NO. 2187

IN RE: AMERICAN MEDICAL SYSTEMS, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION MDL NO. 2325

IN RE: BOSTON SCIENTIFIC, PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION MDL NO. 2326

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION MDL NO. 2327

IN RE: COLOPLAST PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION MDL NO. 2387

IN RE: COOK MEDICAL, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION MDL NO. 2440

IN RE: NEOMEDIC PELVIC REPAIR SYSTEM PRODUCT LIABILITY LITIGATION MDL NO. 2511

THIS DOCUMENT RELATES TO ALL CASES

**NOTICE OF INTENT OF ANDRUS WAGSTAFF, PC TO FILE OPPOSITION TO
COMMON BENEFIT FEE AND COST COMMITTEE'S PETITION FOR AN AWARD
OF COMMON BENEFIT ATTORNEYS' FEES AND EXPENSES**

Andrus Wagstaff, PC, Co-Lead Counsel in *In Re: Boston Scientific, Pelvic Repair System Productions Liability Litigation*, MDL No. 2326, by and through undersigned counsel, hereby submits its intent to file an opposition to the Common Benefit Fee and Cost Committee's Petition for an Award of Common Benefit Attorneys' Fees and Expenses, and in support thereof states:

1. On November 12, 2018, Common Benefit Fee and Cost Committee in the above-captioned MDL litigation filed a Petition for an Award of Common Benefit Attorneys' Fees and Expenses (the "Petition").
2. The Petition does not, on its face, indicate that any of the lawyers representing plaintiffs in the above-captioned matters intended to oppose the Petition. In fact, Andrus Wagstaff, PC, Co-Lead Counsel for Plaintiffs in *In re: Boston Scientific Corp., Pelvic Repair Systems Productions Liability Litigation* (MDL No. 2326), intends to do so.
3. Upon the filing of the Petition, Andrus Wagstaff, PC, promptly retained outside counsel, Blank Rome, LLP, to prepare its opposition to the Petition.
4. This Notice is provided so that the Court will not simply grant the Petition based on the assumption that it is unopposed.

Blank Rome LLP

Dated: November 16, 2018

/s/Andrew Williamson
Andrew Williamson
1825 Eye St., NW
Washington, DC 20006
(202) 420-2252
(202) 379-9314 (fax)
awilliamson@blankrome.com

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION

IN RE: C.R. BARD, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION MDL NO. 2187

IN RE: AMERICAN MEDICAL SYSTEMS, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION MDL NO. 2325

IN RE: BOSTON SCIENTIFIC, PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION MDL NO. 2326

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION MDL NO. 2327

IN RE: COLOPLAST PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION MDL NO. 2387

IN RE: COOK MEDICAL, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION MDL NO. 2440

IN RE: NEOMEDIC PELVIC REPAIR SYSTEM PRODUCT LIABILITY LITIGATION MDL NO. 2511

THIS DOCUMENT RELATES TO ALL CASES

CERTIFICATE OF SERVICE

I do hereby certify that on this 16th day of November 2018, I, electronically filed the foregoing Notice of Intent of Andrus Wagstaff, PC, to File Opposition to Common Benefit Fee and Cost Committee's Petition for an Award of Common Benefit Attorneys' Fees and Expenses with the Clerk of Court and served via this Court's electronic filing system, ECF on those participants registered to receive service in this MDL.

/s/Andrew Williamson
Andrew Williamson